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September 4, 2019

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VIA ECF

Hon. Madeline Cox Arleo  
United States District Judge  
Martin Luther King Federal Building  
50 Walnut Street  
Newark, New Jersey 07102

Re: In re American Medical Collection Agency, Inc. Customer Data Security Breach Litigation  
Civil Action No. 19-md-2904(MCA)(MAH)

Dear Judge Arleo:

As Your Honor is aware, I am interim lead counsel for Plaintiffs. In accordance with the Court's Initial Case Management Order (Docket Entry 9), I am working to develop a proposal to submit to the Court regarding the initial organization of Plaintiffs' counsel. While I am confident that we will present an inclusive and efficient structure, it is not possible in a large case such as this to include each and every qualified counsel in the proposal. As such, in order to insure that all qualified counsel have an opportunity to advocate on his or her behalf, I believe that any lawyer who seeks a leadership position, and is not included in my proposal, should submit an individual application to Your Honor by the same date – September 15. Of course, I am hopeful that such applications will honor brevity and be as streamlined as possible. If this proposal is acceptable to the Court, please So Order this letter or have your chamber's let me know the best way to proceed.

Thank you for your attention to this matter. If the Court has any questions we are, of course, available at your convenience.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO

/s/ James E. Cecchi

JAMES E. CECCHI

cc: All Counsel (via ECF)